

Honorable Commission,

Thank you for accepting my brief comment regarding the proposition, RM-10412, that all amateur gear, excepting receivers, be field serviceable. If the petition is not an April Fools joke, then please tally one more vote in horrified opposition.

One assumption seems to be that every Ham will keep a complete duplicate stock of all the parts for their individual radios, in wait of the possibility that one of them will fail one day. The inefficiency of every Ham keeping duplicate stock "just in case" is absurd.

In the second best case, parts could be shipped "overnight" as required, but already the concept of "instant repair" for the benefit of uninterrupted emergency communications becomes moot. Furthermore, I disagree with the petitioner when he says that swapping out a board, should one be available, would be a significant educational experience.

There would be further complications if the Ham orders the wrong part. Aside from the repairs becoming even less instant, the "restocking fees" for a piece of static-sensitive equipment would be astronomical. I wouldn't want a static-sensitive device that had been previously shipped - out of the control of the static-protection measures that the manufacturers have in place. A static-sensitive board that has been improperly handled may work OK today, but it will have significantly reduced reliability. It can be statistically demonstrated that this type of un-apparent static damage happens regularly when static safety is interrupted, but the degraded reliability of a particular piece cannot be detected until the failure occurs - perhaps a week or a year later. Electronics manufacturers spend lots of money to assure continual anti-static safety to increase their Mean Times Before Failure. But all assurance would be lost after the components were shipped to a customer and returned, with no way for the factory to determine if the trip had caused reliability-reducing damage to sensitive solid-state devices at the molecular level. An incorrectly ordered part would be an expensive exercise in waste generation.

It might be easier to consider keeping a duplicate stock of your radio's innards if they are assembled with the simplicity and capability of today's home-built QRP radios, for which the petitioner has indicated he has a predilection. It is fine to build a station with internal parts that meet this criteria, but it seems like it would be a greater loss to prohibit the availability of more complicated equipment with greater capabilities.

It would also be difficult to define and mandate which construction is field-serviceable, and which is not. That would be a varying function of the capabilities of the individual Hams.

Respectfully,
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